

TELETRONICS *Communications*

February 6, 2006

VIA ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

RE: Teletronics Services, Inc.
Certification of CPNI Filing (February 6, 2006)
EB Docket No. 06-36
EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission rules concerning telecommunications carriers protection of the privacy of customer proprietary network information ("CPNI"),² Teletronics Services, Inc. (the "Company") submits this Compliance Statement and Certificate. Protecting CPNI is an important obligation for all Telecommunications carriers and the Company has adopted various operational procedures to assure that all of the CPNI that it holds is protected from unauthorized and illegal use, access and disclosure.

As requested by the Public Notice, the undersigned, as an officer of the Company, certifies based upon personal knowledge that the following Compliance Statement describes the operational procedures and policies implemented by the Company to ensure the privacy of its customers' CPNI consistent with the Commission's CPNI rules.

- 1 Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").
- 2 47 C.F.R. § 64.2001, et seq..

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STATEMENT OF COMPLIANCE WITH CPNI RULES

The Company is primarily a provider of integrated telecommunications systems, including sales of telephone systems, voice processing and related sales of cabling and other equipment, primarily in the Cleveland, Ohio area. The Company also provides single billing of certain telecommunications services as part of its systems integration services. Further, as a reseller, the Company provides long distance telecommunications services to certain of its telephone systems customers. The Company is an agent for other telecommunications carriers, offering other services such as access products like 800 or switched access.

The Company has elected to utilize or provide CPNI only for purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. Accordingly, the Company currently does not use CPNI in a manner that requires customer approval and is not required to implement a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. Therefore, as permitted by the CPNI rules, the Company may use CPNI (1) to bill and collect for services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) to provide customer premises equipment and protocol conversion; and (5) to provision inside wiring, maintenance and repair services.

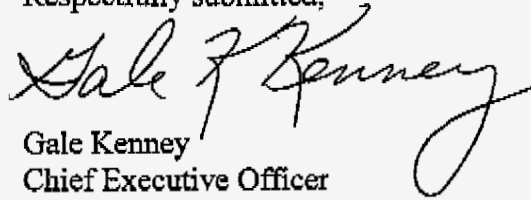
In the event the Company changes its marketing efforts in a way that requires the approval of customers before using CPNI, the Company will implement policies and procedures and train employees to ensure compliance with all relevant FCC rules, including opt-in or opt-out authorizations.

The Company does not share, sell, lease and otherwise provide CPNI to any unrelated third parties for the purposes of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties is strictly prohibited by the Company.

The Company has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all Company employees are required to abide by the Company's Code of Conduct, which requires employees to maintain the confidentiality of all information that is obtained as result of their employment by the Company. Employees who violate the Company's Code of Conduct will be subject to discipline, including possible termination. Although the Company has never received any complaint from a customer that it has misused CPNI in any fashion, in an abundance of caution and in light of the recent reports about the availability on the Internet of sensitive, personal subscriber information to third parties, the Company currently is auditing all of its training and discipline policies and procedures relating to the use of CPNI by Company employees. In the event the Company determines that Company employees require more training in order to protect CPNI, the Company will update its training processes and other procedures as necessary.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns. The Company does some limited marketing of new services to existing customers on a case-by-case basis. Records of these customer contacts are maintained in Company databases. Specifically, the Company utilizes a contact management database that tracks customer contacts made by Company sales and marketing employees, and the Company utilizes an account management and trouble ticketing system that documents all contacts with customers. These records are maintained for at least one year. All marketing campaigns are supervised by the Vice President of Sales who maintains records of such supervision for at least one year.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gale Kenney", written in a cursive style.

Gale Kenney
Chief Executive Officer
Teletronic Services, Inc.

cc: Bryon McKoy via e-mail: byron.mccoy@fcc.gov
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